

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,  
Plaintiff,

v.

JOSE RODOLFO LOPEZ-AMPARO,  
Defendant.

CRIMINAL NO. 17-644 (PG)

**UNITED STATES' EMERGENCY MOTION FOR STAY OF BAIL ORDER  
PENDING MOTION FOR DE NOVO HEARING**

**TO THE HONORABLE COURT:**

The United States of America, by and through its undersigned attorneys, moves this Honorable Court, having original jurisdiction over the offense(s) charged, pursuant to Title 18, *United States Code*, Section 3145(a)(1), for a review of the release order for **JOSE RODOLFO LOPEZ-AMPARO**, entered by Honorable Magistrate Judge Marcos E. López today, December 22, 2017, and for the revocation of said release order to reasonably assure the appearance of the above defendant, as provided by Title 18, *United States Code*, Section 3142.

The United States further moves this Court for an order staying said release order pending disposition of the United States' Motion For De Novo Hearing And Appeal Of Magistrate Judge's Order Releasing Defendant. (DE No. 11). Such a stay will preserve this Court's jurisdiction and protect the integrity of its judicial process, in accordance with Title 28, *United States Code*, Section 1651(a), while any incremental harm to the defendant will be minimized by a prompt determination of the United States' Motion, in accordance with Title 18, *United States Code*, Section 3145(a).

**WHEREFORE**, and in view of the foregoing, the United States of America respectfully requests from this Court to **STAY** the Magistrate Judge's Order granting the defendant bail, pending disposition of the United States' Motion.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 22<sup>nd</sup> day of December 2017.

**ROSA EMILIA RODRIGUEZ-VÉLEZ  
UNITED STATES ATTORNEY**

s/ Sean R. Gajewski  
Special Assistant United States Attorney  
USDC No. G02713  
Torre Chardón, Suite 1201  
350 Carlos Chardón Avenue  
San Juan, Puerto Rico 00918  
Tel: (787) 282-1932

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 22<sup>nd</sup> day of December 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties in this case.

s/ Sean R. Gajewski  
Sean R. Gajewski  
Special Assistant United States Attorney